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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ARGO TURBOSERVE CORPORATION,

Plaintiff,

versus

DEAN ANGELLE AND DENISE ANGELLE,

Defendants.

**CASE NO. 07 CV 8410 (RMB)
(GWG)**

ECF

**DEFENDANTS' MOTION TO
COMPEL DISCOVERY
RESPONSES FROM PLAINTIFF**

NOW INTO COURT, through undersigned counsel, comes defendants, Dean Angelle and Denise Angelle (collectively, "the Angelles"), who, pursuant to Federal Rule of Civil Procedure 37, Local Civil Rule 37.2, and the permission granted by Magistrate Judge Gorenstein on April 15, 2008, move the Court to compel plaintiff, Argo Turboserve Corporation ("ATC") to fully and properly respond to Request for Production Nos. 1, 10 through 15, 19, and 30 of the Angelles' Second Set of Requests for Production.

Because the information sought by these discovery requests is relevant to the subject matter of this action, reasonably calculated to lead to the discovery of admissible evidence, and not subject to any privilege, the Angelles move the Court for an Order pursuant to Rule 37 of the Federal Rules of Civil Procedure compelling ATC to fully and completely respond to the Angelles' discovery requests.

Wherefore, for the reasons more fully set forth in the accompanying memorandum in support of this motion, the Angelles ask that the Court grant their Motion to Compel Discovery.

Respectfully Submitted,

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AND

/s/ Eric Michael Liddick

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***Attorneys for Dean Angelle and Denise Angelle,
Defendants***

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been forwarded this day to counsel of record for Argo Turboserve Corporation, ☒ by CM/ECF, ☒ by e-mail, ☐ by telefax, ☐ by hand, and/or ☒ by United States mail.

New Orleans, Louisiana, this 22nd day of April, 2008.

/s/ Eric Michael Liddick

ERIC MICHAEL LIDDICK